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**By ECF**

December 12, 2024

The Honorable Richard M. Gergel  
United States District Court  
for the District of South Carolina  
P.O. Box 835  
Charleston, South Carolina 29402

**Re: *Tyco Fire Products LP v. AIU Ins. Co., et al.*, Civ. No. 2:23-cv-2384 (D.S.C.)**

Dear Judge Gergel:

Further to the Court's Scheduling Order dated October 30, 2023 (ECF 111), we write jointly on behalf of (1) Tyco Fire Products LP ("Tyco") and (2) Allianz Global Risks US Insurance Company ("Allianz") to inform the Court that Tyco and Allianz have reached a settlement-in-principle. This settlement-in-principle must be finalized through a formal written agreement, which Tyco and Allianz expect to finalize expeditiously.

In the event that Tyco and Allianz are unable to finalize their written settlement agreement, they will jointly and promptly report to the Court with a further update and proposed course of action.

Respectfully submitted,

WILLS MASSALON & ALLEN LLC

s/Christy Ford Allen

Christy Ford Allen (Fed Bar 09549)  
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-and-

s/Allan B. Moore

Allan B. Moore (*pro hac vice*)  
Covington & Burling LLP

cc: All Counsel of Record (by ECF)